

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

CRYSTAL GOOD, et al.,

Plaintiffs,

v.

**Civil Action No. 2:14-cv-01374
The Honorable John T. Copenhagen, Jr.**

**AMERICAN WATER WORKS COMPANY,
et al.,**

**Consolidated with:
Civil Action No. 2:14-cv-13164
Civil Action No. 2:14-cv-11011
Civil Action No. 2:14-cv-13454**

Defendants.

**COUNSEL TIMOTHY KOONTZ'S RENEWED MOTION TO INTERVENE
AS TO AWARD OF ATTORNEYS' FEES and NOTICE OF LIEN**

COMES NOW M. Timothy Koontz, as former co-counsel for class representative R.G. Gunnoe Farms, LLC, and others, and hereby renews and incorporates by reference the earlier-filed *Counsel Timothy Koontz's Motion to Intervene as to Award of Attorneys' Fees and Charging Lien* [Doc. 1186], and respectfully moves this Honorable Court to permit his intervention in the above-captioned action for the purpose of obtaining attorneys' fees due and owing to him under an agreement entered into with Underwood & Protctor Law Offices and Mark F. Underwood [herein after collectively "Underwood"] regarding representation of the above-referenced client(s). Further, Mr. Koontz herein notifies all parties to this action of his attorney's lien pursuant to W.Va. Code § 30-2-15. Mr. Koontz hereby advises the Court and all parties hereto of his lien for services rendered in an amount consistent with the agreement entered into with Underwood & Proctor Law Offices and Mark F. Underwood regarding representation of R.G. Gunnoe Farms, LLC, and others. Upon information and belief, there has been an updated or additional payment of attorneys' fees subject to Mr. Koontz's present motion.

WHEREFORE, M. Timothy Koontz respectfully request that this Honorable Court make a finding that he is entitled intervene in this action and, further, that Mr. Koontz is entitled to fifty percent (50%) of any additional attorneys' fees awarded to Underwood & Proctor Law Offices and/or Mark F. Underwood in this action. Mr. Koontz further requests all other and further such relief as the Court deems just and proper.

M. TIMOTHY KOONTZ,
By Counsel,

/s/ Amanda J. Taylor
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Amanda Taylor, Esq. WVSB#11635
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CERTIFICATE OF SERVICE

NOW comes Amanda J. Taylor, as counsel for proposed intervenor M. Timothy Koontz, and all other similarly situated individuals, who hereby states that a true and exact copy of **COUNSEL M. TIMOTHY KOONTZ'S RENEWED MOTION TO INTERVENE AS TO AWARD OF ATTORNEYS' FEES AND NOTICE OF LIEN** was filed with the Clerk of the Court on this 18th day of June, 2019, and said true and exact copy was served upon the Parties hereto via the CM/ECF system as follows:

/s/ Amanda J. Taylor

Amanda J. Taylor, Esq. (WVSB#11635)